



**DEPARTMENT OF THE ARMY**  
DANGER COMPANY, 54<sup>TH</sup> BRIGADE ENGINEER BATTALION  
173<sup>RD</sup> INFANTRY BRIGADE COMBAT TEAM (AIRBORNE)  
CASERMA DEL DIN, ITALY  
APO AE 09630

AESE-BGG-D

23 September 2021

MEMORANDUM FOR RECORD

SUBJECT: Request for Food and Drug Administration (FDA) approved Vaccine for Mandatory Coronavirus Disease Vaccination

1. According to the Secretary of Defense's Memorandum entitled *Mandatory Coronavirus Disease 2019 Vaccination of Department of Defense Service Members*, dated 24AUG2021, Mandatory vaccination against COVID-19 will only use COVID-19 vaccines that receive full licensure from the Food and Drug Administration (FDA), in accordance with FDA-approved labeling and guidance [1].
2. The licensed vaccine [COMIRNATY (COVID-19 Vaccine, mRNA)] has the same formulation as the EUA-authorized vaccine [Pfizer-BioNTech COVID-19 Vaccine] and the products can be used interchangeably to provide the vaccination series without presenting any safety or effectiveness concerns. The products are **legally distinct** with **certain differences** that do not impact safety or effectiveness [2]. Additionally, it is explicitly stated in the FDA fact sheet for the Emergency Use Authorization (EUA) of the Pfizer-BioNTech Covid-19 to prevent Coronavirus Disease 2019 (COVID-19), that the Pfizer-BioNTech COVID-19 Vaccine is **unapproved** and has been issued under EUA authority [3].
3. In keeping within the guidance outlined by the Secretary of Defense and OPORD 21-029 (173B MANDATORY CORONAVIRUS DISEASE (COVID-19) SERVICE MEMBER (SM) VACCINATIONS), I do not volunteer for the EUA Pfizer-BioNTech COVID-19 Vaccine, and I want to be provided the FDA licensed COMIRNATY (COVID-19 Vaccine, mRNA). I am requesting a temporary administrative waiver until the FDA approved COMIRNATY (COVID-19 Vaccine, mRNA) licensed vaccine is available in our location so that I can meet the Secretary of Defense's intent of 100% vaccination.

Steven Brown  
SSG, USA  
SCT Squad Leader

Encls

1. Memorandum for Mandatory Coronavirus Disease 2019, Vaccination of Department of Defense Service Members, August 24, 2021
2. Pfizer-BioNTech COVID-19 Vaccine EUA LOA, reissued September 22, 2021
3. Pfizer-BioNTech COVID-19 Vaccine EUA Fact Sheet for Recipients and Caregivers, Revised September 22, 2021

## **Enclosure Sources**

Memorandum for Mandatory Coronavirus Disease 2019, Vaccination of Department of Defense Service Members

<https://media.defense.gov/2021/Aug/25/2002838826/-1/-1/0/MEMORANDUM-FOR-MANDATORY-CORONAVIRUS-DISEASE-2019-VACCINATION-OF-DEPARTMENT-OF-DEFENSE-SERVICE-MEMBERS.PDF>

Pfizer-BioNTech COVID-19 Vaccine EUA LOA, reissued September 22 2021

<https://www.fda.gov/media/150386/download>

Pfizer-BioNTech COVID-19 Vaccine EUA Fact Sheet for Recipients and Caregivers

<https://www.fda.gov/media/144414/download>